

LYNCH CARPENTER LLP
Matthew J. Zevin (CA 170736)
mattz@lcllp.com
Todd D. Carpenter (CA 234464)
todd@lcllp.com
James B. Drimmer (CA 196890)
jim@lcllp.com
Scott G. Braden (CA 305051)
scott@lcllp.com
1234 Camino Del Mar
Del Mar, California 92014
Telephone: (619) 762-1900
Facsimile: (858) 313-1850

*Attorneys for Plaintiff and Proposed Class
Counsel*

[Additional counsel on signature page]

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PAMELA CHO on behalf of herself and all
others similarly situated,

Plaintiff,

v.

THE GAP, INC., a Delaware corporation,
GAP (APPAREL) LLC, a California limited
liability company, GAP INTERNATIONAL
SALES, INC., a Delaware corporation, and
DOES 1-50, inclusive,

Defendants.

Case No. 4:24-cv-05206-HSG

**STIPULATION REGARDING
EXTENSION OF BRIEFING SCHEDULE
FOR DEFENDANTS' MOTION TO
DISMISS AND ORDER GRANTING
EXTENSION**

CLASS ACTION

Judge: Hon. Haywood S. Gilliam, Jr.

1 WHEREAS, Plaintiff in the above-captioned action filed her complaint in the Superior Court
2 of California for the County of San Francisco, captioned *Cho v. The Gap, Inc., et al.*, No. CGC-24-
3 616357, on July 12, 2024, which was removed to this Court on August 15, 2024;

4 WHEREAS, on August 20, 2024, Defendants filed their Motion to Dismiss Class Action
5 (ECF No. 6);

6 WHEREAS, on August 29, 2024, the Court granted the parties' stipulation to extend the
7 deadline for Plaintiff to oppose the Motion to Dismiss to September 26, 2024, and the deadline for
8 Defendants to submit a Reply in support of the Motion to Dismiss to October 10, 2024, with a hearing
9 set for 2:00 pm on October 24, 2024 (ECF No. 20);

10 WHEREAS, on September 23, 2024, the parties filed a Stipulation Regarding Request to Stay
11 Action Pending Mediation (ECF No. 23), and the Court has not yet acted on that request;

12 WHEREAS, in apparent response to the parties' requested stay pending mediation, the Court
13 scheduled a Case Management Conference for 2:00 p.m. on October 1, 2024;

14 WHEREAS, in service of judicial economy, counsel for the Parties have conferred and agreed
15 to request a two-week extension of the briefing schedule related to Defendant's Motion to Dismiss
16 while the Court further evaluates their requested stay pending mediation;

17 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the parties hereto,
18 through their undersigned counsel, and request that the Court order as follows:

- 19 1. Plaintiff's opposition to Defendants Motion to Dismiss shall be due on October 10,
20 2024, Defendants' Reply shall be due on October 24, 2024, with the hearing to be set
21 thereafter at the Court's convenience.

22 **IT IS SO STIPULATED.**

23
24 DATED: September 24, 2024

25 **LYNCH CARPENTER LLP**

26 By: /s/ Todd D. Carpenter

**SKADDEN ARPS SLATE MEAGHER &
FLOM LLP**

27 By: /s/ Jason D. Russell
Jason D. Russell (SBN 169219)

Todd D. Carpenter (SBN 234464)
1234 Camino Del Mar
Del Mar, California 92014
Telephone: (619) 762-1900
Facsimile: (619) 313-1850
Email: todd@lcllp.com

LYNCH CARPENTER LLP

SCOTT G. BRADEN (SBN 305051)
scott@lcllp.com
JAMES B. DRIMMER (SBN 196890)
jim@lcllp.com
1234 Camino Del Mar
Del Mar, California 92014
Telephone: (619) 762-1900
Facsimile: (619) 313-1850

Counsel for Plaintiff Pamela Cho

300 South Grand Avenue, Suite 3400
Los Angeles, California 90071-3144
Telephone: (213) 687-5000
Facsimile: (213) 687-5600
Email: jason.russell@skadden.com

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

HILLARY A. HAMILTON (SBN 218233)
300 South Grand Avenue, Suite 3400
Los Angeles, California 90071-3144
Telephone: (213) 687-5000
Facsimile: (213) 687-5600
Email: hillary.hamilton@skadden.com

MICHAEL W. McTIGUE, JR.*
michael.mctigue@skadden.com
MEREDITH C. SLAWE*
meredith.slawe@skadden.com
One Manhattan West
New York, New York 10001-8602
Telephone: (212) 735-3000
Facsimile: (212) 735-2000

Counsel for Defendants The Gap, Inc., *et al.*
*Admitted *pro hac vice*

ATTESTATION PURSUANT TO LOCAL RULE 5-1

Pursuant to Civil L.R. 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the other signatories.

DATED: September 24, 2024

/s/Todd D. Carpenter

Todd D. Carpenter

ORDER

PURSUANT TO THE ABOVE STIPULATION, IT IS SO ORDERED.

DATED: 9/25/2024

Haywood S. Gilliam, Jr.
Hon. Haywood S. Gilliam, Jr.
United States District Judge